

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,)	
<i>Plaintiff,</i>)	
)	
V.)	Cause No. 1:24-cr-060-SEB-MJD
)	
)	
LATASHA SADIE WEATHERSPOON,)	-01
a/k/a “Tasha”, “Whole Heart”)	
)	
MARLENE RICHARDSON,)	-02
a/k/a “Misha Joe”)	
)	
CHRISTINE ANGELA ENRIQUEZ.)	-03
a/k/a “Christina”, “Chrissy”)	
<i>Defendants.</i>)	

UNITED STATES’ MOTION FOR PROTECTIVE ORDER

The United States of America, by counsel Zachary A. Myers, United States Attorney for the Southern District of Indiana, and Cristina Caraballo-Colón, Assistant United States Attorney, moves this Court to issue a protective order regarding discovery provided, and would show the Court as follows:

1. The defendants were charged by Indictment returned on April 27, 2024. (Dkt. 54.) On May 9, 2024, the Government produced a first discovery package. In the discovery letter for that first production, the Government requested the attorneys to provide an external hard drive with a capacity of at least 2 TB for the production of the electronic devices’ extractions.

2. Accordingly, on June 4, 2024, the Government informed the attorneys that a discovery package titled “Discovery Package Dated Tuesday, June 4, 2024

(Extractions)” consisting of the electronic devices’ extractions saved into the external hard drives provided by the defense attorneys, was ready and available for their pickup at the office of the United States Attorney. The contents of these extractions contain personal identifying information of the defendants and of unknown persons that cannot be redacted due its extensiveness and to protect the integrity of the contents as they were extracted from the devices. This information is related to financial transactions involving CashApp and other mobile payment service platforms, which is currently under investigation.

3. To protect all the personal identifying information contained in the provided electronic devices’ extractions, the United States respectfully requests the Court to issue a protective order requiring the parties to adhere to the following conditions:

a. Only the above-named Defendants, counsel for Defendants, designated defense team members, or potential defense witnesses may view these materials, which are to remain in the sole custody of defense counsel or his or her designated agent at all times.

b. At no time shall these materials be copied or disseminated to any other person.

c. Any pleading that refers to these disclosures that may reveal personal identifying information should be filed under seal until further order of the Court.

d. Any reference to the identity of a target of an ongoing investigation prior to trial, apart from those outlined in this Order, shall be made upon notice to the government and with leave of the Court.

e. Any materials constituting part of this disclosure shall be returned to the government or certified as destroyed at the conclusion of this case.

f. Leave of the Court to deviate from the conditions of the Protective Order must be requested in writing and filed under seal.

g. Failure to comply with the terms of this Order is punishable by contempt of court.

4. The undersigned consulted with the defense counsels regarding the instant motion. All three counsels indicated that they do not oppose the motion.

The United States further requests that the above conditions apply to not only defense counsels but also to any investigator and/or other attorney employed by the defense team.

WHEREFORE, the United States of America requests the Court issue the requested protective order for the electronic devices' extractions.

Respectfully submitted,

ZACHARY A. MYERS
United States Attorney

By: /s/ Cristina Caraballo-Colón
Cristina Caraballo-Colón
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2024, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: /s/ Cristina Caraballo-Colón
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